## UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

RAPE, ABUSE & INCEST NATIONAL NETWORK (RAINN)

:

And Case No. 05-UC-150222

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WASHINGTON-BALTIMORE NEWSPAPER GUILD, LOCAL 32035

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## WASHINGTON-BALTIMORE NEWSPAPER GUILD'S MOTION FOR EXTENSION OF TIME

Washington-Baltimore Newspaper Guild, Local 32035, the Petitioner herein, by counsel, pursuant to Section 102.67 of the NLRB Rules and Regulations, hereby requests an extension of time to and including January 19, 2016 for filing a Request for Review in the above- captioned cause.

In support of its Motion, Petitioner states as follows:

- 1. On December 22, 2015, the Regional Director for Region 5 issued his decision in this matter by which he concluded that the petition should be dismissed. In said Decision, the Regional Director established January 5, 2016 as the date for filing a Request for Review.
- 2. The undersigned received the decision in this case on the eve of previously scheduled travels during the holiday period, and will not return to his office until December 31, 2015.

3. Under the circumstances, and in light of the important issues raised by this Petition, the Petitioner requests that the date for the submission of its Request for Review be extended to and including January 19, 2016.

WHEREFORE, the Petitioner requests that this Motion be granted.

Respectfully submitted,

/s/ Robert E. Paul Robert E. Paul Zwerdling, Paul, Kahn & Wolly, PC 1025 Connecticut Ave. NW, Suite 712 Washington, DC 20036 (202) 857-5000 (202) 223-8417 fax rpaul@zwerdling.com

Attorneys for Petitioner Washington-Baltimore Newspaper Guild

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 29, 2015, a copy of the foregoing was served electronically and mailed, first class mail postage prepaid, to Charles L. Posner, Regional Director, National Labor Relations Board, Region 5, 100 S. Charles Street, Suite 600, Baltimore, MD 21201, and to Louis J. Cannon, Jr., Jackson Lewis, 2800 Quarry Lake Drive, Baltimore, MD 21209.

/s/ Robert E. Paul